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General Assembly of North Carolina
Environmental Review Commission
State Legislative Building
Raleigh 27611

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3 August 1990

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The Honorable William K. Reilly, Administrator
U.S. Environmental Protection Agency
401 M Street, Southwest
Washington, D. C. 20460

Re: HiTEC 3000 Gasoline Performance Additive

Dear Mr. Reilly:

I am deeply concerned about the air quality of our State and nation. I have been informed that a gasoline performance additive known as HiTEC 3000 may present a real opportunity to substantially improve air quality in the United States. I am advised that this additive seems to have a significant impact in reducing oxides of nitrogen and could thus play a major role in reducing smog. I understand that this additive is compatible with gasolines containing methanol, ethanol, and other reformulated fuels.

I also understand that there is some opposition to approval of the use of HiTEC 3000 because of its manganese content. Obviously no product should be approved if its use would pose a significant risk to the environment or public health. However, I am advised that extensive testing of HiTEC 3000 has conclusively demonstrated its value in reducing motor vehicle air pollutant emissions.

Any possible way to improve our nation's air quality should be examined to the fullest. Most pollution abatement technologies involve some trade offs. I am informed that the advantages of HiTEC 3000 are significantly greater than whatever disadvantages may exist. Based on this information and on the assumption that the studies conducted to date will be confirmed by the Environmental Protection Agency's independent review, it is my hope that approval for the use of this additive will be

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The Honorable William K. Reilly
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given every reasonable consideration by the Environmental
Protection Agency.

Sincerely,

Russell Walker /GFG

Russell G. Walker
State Senator and Chairman
Environmental Review Commission

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IRVING OIL LIMITED



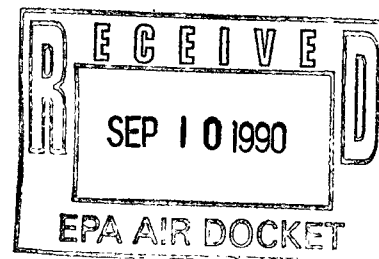
REFINING DIVISION

August 10, 1990

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U. S. Environmental Protection Agency
 401, M. Street S.W.
 Washington, D.C. 20460

Attention: Mary T. Smith, Director
 Field Operations and
Support Division



Dear Ms. Smith:

Re: M.M.T. Waiver
 Docket A-90-16

With reference to the Ethyl Corporation application for a waiver to Section 211 (f) 4 of the Clean Air Act for the fuel additive MMT to be blended into unleaded gasoline, we have the following comments to offer:

- (1) Irving Oil Limited is a major refiner and marketer of gasoline in the eastern provinces of Canada including New Brunswick, Prince Edward Island, Quebec, Nova Scotia and Newfoundland.
- (2) Irving Oil Limited has extensive experience in the use of MMT which we have used in all unleaded grades of gasoline for the past ten years at concentrations of 0.068 gms/usg of manganese.
- (3) The use of MMT in gasoline has been beneficial to the refinery and the consumer as a low cost octane booster. The use of the additive permits lower severity operation of the catalytic reformer, resulting in a higher product yield, lower energy costs and reduced aromatic content.
- (4) Irving Oil has had no problems with the use of MMT either in the refinery distribution network, terminals or with the customer. Customer satisfaction is of prime importance to our oil company and we take great pride in assuring our customer of high quality products. We have not detected any signs of problems with regard to performance, driveability, maintenance or any other aspects related to MMT in gasoline.

Based on our ten years experience with the use of MMT, we are pleased to support the Ethyl Corporation application for waiver.

Yours truly,

Robert A. Chalmers

R. A. Chalmers,
 General Manager

BE/sll